



As set forth more fully in the accompanying Memorandum of Law, pursuant to Rule 12(f) and Rule 12(b)(6) of the Federal Rules of Civil Procedure, Compass's Counterclaims should be struck or dismissed as procedurally deficient and meritless. Compass was required to seek leave to assert the Counterclaims but failed to do so. Even if Compass had sought leave, there is no basis for leave to add new claims now, long after the deadline to amend pleadings. Moreover, even if leave to amend were granted, amendment would be futile: Compass's Counterclaims fail to state a claim and should be dismissed. For all these reasons, Plaintiffs respectfully request that this Court grant Plaintiffs' motion to strike and dismiss Compass's Counterclaims (ECF No. 208). Plaintiffs request a hearing on this motion pursuant to Local Rule 105(6).

**[SIGNATURES ON NEXT PAGE]**

Dated: August 15, 2025

/s/ Steven C. Cherny

Steven C. Cherny (*pro hac vice*)  
Matthew A. Traupman (*pro hac vice*)  
Nicola R. Felice (*pro hac vice*)  
Abigail M. Graegin (*pro hac vice*)  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
295 Fifth Avenue  
New York, New York 10016  
Telephone: (212) 849-7000  
stevencherny@quinnemanuel.com  
matthewtraupman@quinnemanuel.com  
nicolafelice@quinnemanuel.com  
abbygraegin@quinnemanuel.com

Robert S. Brennen (Fed. Bar No. 04499)  
Megan J. McGinnis (Fed. Bar No. 12810)  
MILES & STOCKBRIDGE P.C.  
100 Light Street  
Baltimore, Maryland 21202  
T/F: (410) 385-3727  
rbrennen@milesstockbridge.com  
mmcginnis@milesstockbridge.com

/s/ Patrick D. Curran

Patrick D. Curran (*pro hac vice*)  
Kathleen Marini (*pro hac vice*)  
Ryan P. Gorman (*pro hac vice*)  
Alexandra O. Schelle (*pro hac vice*)  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
111 Huntington Ave, Suite 520  
Boston, Massachusetts 02199  
Telephone: (617) 712-7100  
patrickcurran@quinnemanuel.com  
kathleenmarini@quinnemanuel.com  
ryangorman@quinnemanuel.com  
alexandraschelle@quinnemanuel.com

Ramsay M. Whitworth (Fed. Bar #26251)  
Email: rwhitworth@silvermanthompson.com  
Andrew M. Harvey (Fed. Bar #21925)  
Email: aharvey@silvermanthompson.com  
SILVERMAN, THOMPSON, SLUTKIN & WHITE  
400 East Pratt Street, Suite 900  
Baltimore, MD 21202  
Telephone: (410) 385-2225  
Facsimile: (410) 547-2432

*Attorneys for Plaintiffs Terran Biosciences,  
Inc. and Professor Scott Thompson*

/s/ Steven E. Tiller

Steven E. Tiller (Bar #11085)  
WHITEFORD, TAYLOR & PRESTON LLP  
7 Saint Paul Street, Suite 1500  
Baltimore, MD 21202  
Telephone: (410) 347-9425  
Facsimile: (410) 223-4325  
stiller@whitefordlaw.com

*Attorney for Plaintiff  
University of Maryland, Baltimore*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on this 15th day of August 2025, a copy of Plaintiffs' Motion to Strike and Dismiss Compass's Counterclaims was served via CM/ECF on all counsel of record.

*/s/ Megan J. McGinnis*

---

Megan J. McGinnis